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October 29, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **Notice of Ex Parte Presentation** — National Exchange Carrier Association, Inc. Petition for Rulemaking to Amend Section 69.104 of the FCC Rules.
RM No. 10603

Dear Ms. Dortch:

On October 23, 2003, Pat Chirico and Bill Cook of the National Exchange Carrier Association, Inc. (NECA) had a conference call with Judith Nitsche, Aaron Goldschmidt, Jeremy Marcus, and Eugene Gold from the Pricing Policy Division of the Wireline Competition Bureau regarding the Joint Petition for Expedited Waiver of Section 69.104 of the Commission Rules, filed August 19, 2003 (*Waiver Petition*). Discussions focused on the impact of the waiver on Interstate Common Line Support (ICLS), multiline business rates, as well as on network provisioning for PRI ISDN and T-1-provided exchange services when loops exceed 12 kft.

After reviewing the record following the conference call, NECA is resubmitting two diagrams that were originally included in NECA's February 27, 2003 ex parte in RM No. 10603. The new diagrams are more legible than the electronic version filed with the Commission in February.

The first diagram (marked page 6) compares PRI ISDN and Digital Transport Service (DTS) provisioning for situations where the loop length is greater than 12 kft and the facility is copper from the wire center to the customer's premises. With copper, intermediate line repeaters are frequently used to extend the range of service beyond 12 kft. The same line repeaters are used for both ISDN-PRI and T1 exchange service.

The second diagram (marked page 7) compares PRI ISDN and Digital Transport Service (DTS) provisioning for situations where a combination of fiber and copper is used in the loop to provide either PRI ISDN or T-1 exchange service (e.g., DTS Service). Two types of actual provisioning examples are shown for fiber, one with an AFC Remote Exchange terminal, and the other with an AnyMedia terminal. Either terminal can be used to provision T1 exchange or ISDN-PRI. The diagrams on pages 6 and 7 illustrate that T1 exchange service is still provisioned in the same manner as a PRI ISDN service for service beyond 12 kft.

Also attached is an updated analysis using Common Line pool cost data from NECA's 2003 annual access filing (Exhibit 1) which shows that the relative cost of the T-1 loop as compared to a voice grade analog (POTS) loop is 3.76 to 1 for pool members. This exhibit was referenced in footnote 13 of the *Waiver Petition* but inadvertently omitted from the filing. The exhibit was not discussed as part of the October 23, 2003 call but is included now to ensure a complete record on the matter.

In accordance with the Commission's rules, a copy of this Notice has been filed electronically in the above referenced docket.

Sincerely,

A handwritten signature in black ink, appearing to read "Colin Sandy", with a stylized flourish at the end.

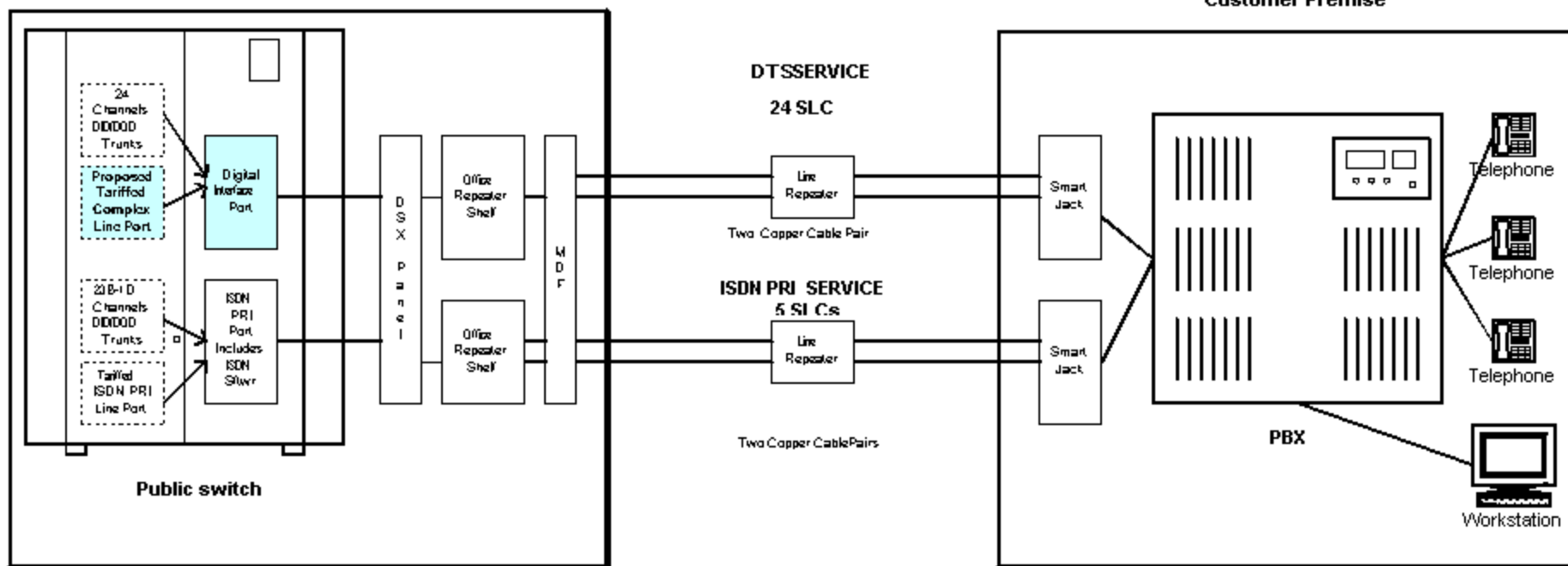
Colin Sandy

cc: Judith Nitsche, PPD
Aaron Goldschmidt, PPD
Jeremy Marcus, PPD
Eugene Gold, PPD
Qualex International

COMPARISON OF ISDN PRI AND DIGITAL TRANSPORT SERVICE (DTS) PROVISIONING

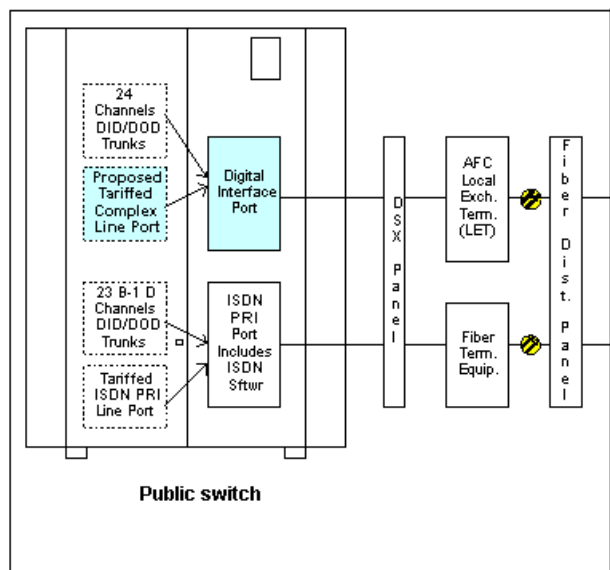
Wire Center

Customer Premise

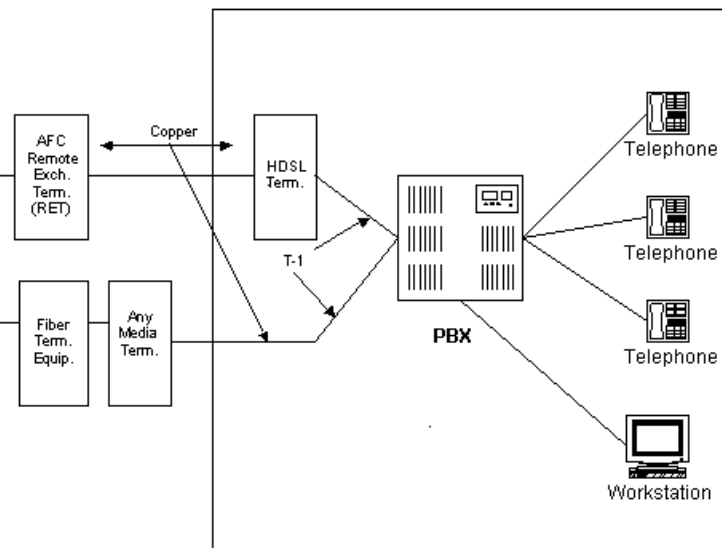


COMPARISON OF ISDN PRI AND DIGITAL TRANSPORT SERVICE (DTS) PROVISIONING

Wire Center



Customer Premise



DTSSERVICE
24 SLC

ISDN PRI SERVICE
5 SLC

DTS or ISDN PRI can be provisioned using either AFC or AnyMedia equipment

EXHIBIT 1

Average Cost of a POTS Loop vs. T1 Channel Termination
Using Cost Data From NECA Annual Filing

Line	Description	Amount	Source *
1	CL Revenue Requirement (incl. Line Ports)	\$1,914,107,000	Vol 2, Ex 1, WP 1
2	Line Port Revenue Requirement	\$140,689,000	Vol 1-2, 61.38 ACR-1 TRP
3	CL Revenue Requirement less Line Ports	\$1,773,418,000	Line 1 - Line 2
4	CL Lines	12,450,485	Vol 3, Ex 1, WP 1
5	Monthly Cost per loop, excl. Port	\$11.87	Line 3/ Line 4/ 12
6	T1 Channel Term rate	\$178.63	Vol 5, Ex 12, WP 8, Line 3180
7	SPF Factor	0.25	Separations
8	Monthly subscriber cost	\$44.66	Line 6 X Line 7
9	T1:Pots Ratio	3.76	Line 8 / Line 5

* Volume references are from NECA Annual Filing, June 16 2003, Trans. 988, and June 30 2003, Trans. 990